



State of Ohio Environmental Protection Agency

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September 12, 2000

Mr. Robert Wayland, Director
Office of Wetlands, Oceans & Watersheds
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Dear Mr. Wayland:

Thank you for your letter of August 11, 2000, updating me on the Action Plan being developed by the Mississippi River/Gulf of Mexico Watershed Nutrient Task Force. With Ohio being one of the 31 states draining into the Mississippi River Basin, and modeling estimates showing 34% of the nitrate load coming from the Ohio River, I believe it is important for Ohio to participate appropriately in implementing the final Action Plan.

As you may know, Ohio is a member state of the Ohio River Valley Water Sanitation Commission (ORSANCO). Representatives from ORSANCO have been attending Task Force meetings since 1995, and ORSANCO intends to submit comments on the draft Action Plan on behalf of member states. Therefore, I have forwarded your letter, the draft Action Plan and the accompanying scientific support document to technical staff in the Division of Surface Water for review and comment. Division staff will forward specific comments on the draft Action Plan to ORSANCO for inclusion in their overall comment letter to your office.

In general, I support the adaptive management protocol the Task Force has chosen for implementing the draft Action Plan. This type of interactive and flexible process is essential for a project of this scope.

I also agree with the formation of sub-basin committees by the summer of 2001 for developing basin-specific nutrient reduction strategies. As basin committees are formed in Ohio, please include Ohio EPA staff. I would also encourage the inclusion of staff from the Ohio Department of Natural Resources, Ohio Department of Agriculture, various County Soil & Water Conservation Districts, ORSANCO, local watershed groups, agricultural trade organizations, etc.

As local nutrient reduction strategies are developed, Ohio EPA will evaluate the strategies when administering the programs listed below and implement actions to reduce nutrient loads when appropriate:

Bob Taft Governor
Maureen O'Connor, Lieutenant Governor
Christopher Jones, Director



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- Point source dischargers with significant discharge of nutrients
- TMDL plans in nutrient-impacted watersheds
- 319 grant applications

The timeline and goals in the draft Action Plan are quite ambitious. However, with the proper financial and technical resources, and use of the adaptive management process, I believe the plan could achieve significant environmental, social and economic benefits.

Thank you for the opportunity to comment on the draft Action Plan. If you have any questions or comments, please contact Lisa Morris, Chief of the Division of Surface Water, at (614) 644-2001.

Sincerely,



Christopher Jones
Director

CJ:jk

cc: Vaslski Keramida, Ph.D., ORSANCO
Fred Daily, Director, Ohio Department of Agriculture
Sam Speck, Director, Ohio Department of Natural Resources
Stuart Bruny, Chief, Ohio EPA Southeast District Office
Jlm Simpson, Surface Water Manager, Ohio EPA Southwest District Office
Lisa Morris, Chief, Ohio EPA Division of Surface Water

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